

EXHIBIT 2

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO, LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF'S OBJECTIONS AND
RESPONSES TO OTTO TRUCKING'S
FIRST SET OF REQUESTS FOR
PRODUCTIONS (NOS. 1-51)**

1 Plaintiff Waymo, LLC (“Waymo”) hereby objects and responds to the First Set of
 2 Requests for Production of Documents (Nos. 1-51) served by Defendant Otto Trucking LLC
 3 (“Otto Trucking”).

4 **GENERAL OBJECTIONS**

5 Waymo makes the following General Objections, whether or not separately set forth in
 6 response to each and every definition and document request.

7 Waymo objects to each request, and to the Definitions and Instructions, to the extent that
 8 they purport to impose any obligations upon Waymo beyond the Federal Rules of Civil Procedure,
 9 the Local Rules of the United States District Court for the Northern District of California, and the
 10 Supplemental Order to Order Setting Initial Case Management Conference in Civil Cases Before
 11 Judge William Alsup (“the Supplemental Order”).

12 Waymo objects to each request to the extent that it seeks information protected by the
 13 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
 14 from discovery.

15 Waymo objects to each request to the extent that they are compound, complex and contain
 16 multiple subparts.

17 Waymo objects to each request to the extent that they seek confidential or proprietary
 18 information, including without limitation, confidential business information, proprietary and/or
 19 competitively sensitive information, or trade secrets. Subject to its other General Objections, and
 20 to any specific objections set forth below, Waymo will only provide relevant information in a
 21 manner consistent with the Protective Order entered by the Court in this matter.

22 Waymo objects to each interrogatory to the extent that they seek information that Waymo
 23 is not permitted to disclose pursuant to confidentiality obligations or agreements with third parties.

24 Waymo objects to each request to the extent that it calls for information that is publicly
 25 available and therefore as accessible to Defendants as to Waymo.

26 Waymo objects to each request to the extent that it is overbroad and not proportional to the
 27 needs of the case, considering the importance of the issues at stake in the action, the amount in
 28 controversy, the parties’ relative access to relevant information, the parties’ resources, the

1 importance of the discovery in resolving the issues, and whether the burden or expense of the
2 proposed discovery outweighs its likely benefit.

3 Waymo objects to each request to the extent that they require Waymo to provide
4 documents beyond what is available to Waymo at present from a reasonable search of its own files
5 likely to contain relevant or responsive documents.

6 Waymo objects to each request to the extent that they are overbroad, unduly burdensome,
7 vague, and/or ambiguous.

8 Waymo objects to each request to the extent that it seeks information that does not already
9 exist, or that is not in Waymo's possession, custody, or control.

10 Waymo objects to each request to the extent that they are unlimited in time or otherwise
11 not limited to a time frame relevant to this litigation and to the patents-in-suit, and therefore
12 burdensome, oppressive, overly broad, and not proportional to the needs of the case.

13 Waymo objects to the definitions of "Waymo," "Plaintiff," "You," and "Your" on the
14 grounds the definitions are overbroad, unduly burdensome, and vague, including, but not limited
15 to, the extent that they include Alphabet Inc. or any Waymo subsidiary, subcontractor, partnership,
16 joint venture, or other business cooperation involving Waymo LLC, Google Inc., and/or Alphabet
17 Inc., the present and former officers, directors, employees, agents, representatives, accountants,
18 financial advisors, consultants, and attorneys or other persons under the owned or controlled by
19 Waymo LLC, Google Inc., and/or Alphabet Inc., regardless of their affiliation or employment.

20 Waymo objects to each and every request to the extent that they call for a legal conclusion.

21 Waymo objects to the definitions of "Uber", "Ottomotto," and "Otto Trucking" as
22 overbroad, and vague and ambiguous because Waymo does not know, for example, all "agents" or
23 "representatives," etc. of each entity.

24 Waymo objects to the definition of "Velodyne" as overbroad, and vague and ambiguous
25 because Waymo does not know, for example, all "agents" or "representatives", etc. of Velodyne.

26 Waymo objects to the definition of "Side Project(s)" and "Side Business(es)" as overly
27 broad, unduly burdensome, vague and ambiguous, to the extent that the definition includes
28 personal side project(s) or business(es).

1 Waymo objects to the definition of “Waymo’s SVN Server” as overbroad and inaccurate to
2 the extent it describes a “Subversion server(s) or repository(ies) which holds technical information
3 and documents including design files, schematics, source code, scripts, and other confidential
4 information regarding Waymo.”

5 Waymo objects to Instruction No. 3 as irrelevant, overbroad, unduly burdensome, and not
6 proportional to the needs of the case to the extent it calls for production in a form beyond that
7 required by the Supplemental Order.

8 Waymo objects to Instruction No. 5 as irrelevant, overbroad, unduly burdensome, and not
9 proportional to the needs of the case to the extent it calls for “[a]ll drafts of a responsive
10 document.”

11 Waymo objects to Instruction No. 6 as irrelevant, overbroad, unduly burdensome, and not
12 proportional to the needs of the case to the extent that it calls for the “file folder or other container
13 in which a Document is kept.”

14 Waymo objects to Instruction No. 10 as overbroad, unduly burdensome, vague, and
15 ambiguous to the extent that it refers to “Provision 1(d) of the Default Standard for Discovery in
16 this judicial district.”

17 Waymo objects to Instruction No. 11 to the extent it calls for Waymo to search for
18 documents beyond what is available to Waymo at present from a reasonable search of its own files
19 likely to contain relevant or responsive documents. Waymo will produce English translations
20 where applicable as located through a reasonably diligent search.

21 Waymo objects to Instruction No. 12 to the extent that it calls for Waymo to conclude that
22 Waymo has no responsive documents in Waymo’s possession, custody, or control. If Waymo is
23 unable to locate responsive documents through a reasonably diligent search, Waymo will so state.

24 Waymo’s responses are not to be construed as an admission that any of the requested
25 information exists, that any information is admissible, relevant or proportional to the needs of the
26 case, or that any contention or assumption contained in the requests, whether implicit or explicit,
27 is correct.

28

1 Waymo responds to these requests based upon its current understanding and reserves the
2 right to supplement its responses at a later time.

3 Waymo incorporates by reference its General Objections in each of the specific responses
4 set forth below.

5 **SPECIFIC OBJECTIONS AND RESPONSES**

6 Waymo objects and responds as follows to Defendants' document requests:

7
8 **REQUEST FOR PRODUCTION NO. 1:**

9 Documents sufficient to identify all Waymo employees, including members of Project
10 Chauffeur, who have access to Waymo's SVN server.

11
12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

13 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
14 the case, considering the importance of the issues at stake in the action, the amount in controversy,
15 the parties' relative access to relevant information, the parties' resources, the importance of the
16 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
17 outweighs its likely benefit.

18 Waymo has produced a document identifying all Waymo employees, including members
19 of Project Chauffeur, who have access to Waymo's SVN server or who had access to Waymo's
20 SVN server from June 2015 to the present. *See* WAYMO-UBER-00007211.

21
22 **REQUEST FOR PRODUCTION NO. 2:**

23 Documents sufficient to identify all Waymo employees, including members of Project
24 Chauffeur, who have accessed Waymo's SVN server from January 2014 to the present.

25
26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

27 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
28 the case, considering the importance of the issues at stake in the action, the amount in controversy,

1 the parties' relative access to relevant information, the parties' resources, the importance of the
2 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
3 outweighs its likely benefit.

4 Waymo has produced a document identifying all Waymo employees, including members
5 of Project Chauffeur, who have access to Waymo's SVN server or who had access to Waymo's
6 SVN server from June 2015 to the present. *See* WAYMO-UBER-00007211.

7
8 **REQUEST FOR PRODUCTION NO. 3:**

9 Documents sufficient to show any Waymo policy, procedure, or guideline, including but
10 not limited to any training, regarding accessing Waymo's SVN server.

11
12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

13 Waymo will produce documents sufficient to show any Waymo policy, procedure, or
14 guideline, including but not limited to any training, regarding accessing Waymo's SVN server, as
15 located through a reasonably diligent search of both custodial documents and non-custodial
16 repositories.

17
18 **REQUEST FOR PRODUCTION NO. 4:**

19 Documents sufficient to show any Waymo policy, procedure, or guideline, including but
20 not limited to any training, regarding which employees have access to Waymo's SVN server.

21
22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

23 Waymo objects to this request as vague to the extent it refers to "any Waymo policy,
24 procedure, or guideline, including but not limited to any training, regarding which employees have
25 access to Waymo's SVN server."

26 Waymo has produced a document identifying all Waymo employees, including members
27 of Project Chauffeur, who have access to Waymo's SVN server or who had access to Waymo's
28 SVN server from June 2015 to the present. *See* WAYMO-UBER-00007211.

1 **REQUEST FOR PRODUCTION NO. 5:**

2 All documents supporting Waymo's claim that "Mr. Levandowski installed special
3 software on his Waymo laptop to access the design server" as described in paragraph 44 of the
4 Waymo Complaint, including all documents relating to and supporting Waymo's claim in its
5 Motion for Preliminary Injunction that Mr. Levandowski downloaded and installed TortoiseSVN
6 software on his Waymo laptop and used that software to access Waymo's SVN server.

7
8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

9 Waymo objects to this request to the extent that it seeks information protected by the
10 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
11 from discovery.

12 Waymo has produced documents supporting Waymo's claim that "the Levandowski work
13 laptop downloaded and installed TortoiseSVN, which is software that can access the self-driving
14 car project's SVN repository, on December 11, 2015." Dkt. 25-29 ¶ 16. *See* WAYMO-UBER-
15 00000648-943.

16
17 **REQUEST FOR PRODUCTION NO. 6:**

18 Documents sufficient to identify each Waymo employee, including members of Project
19 Chauffeur, who has installed on his or her computer TortoiseSVN or other software that may be
20 used to access Waymo's SVN server.

21
22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

23 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
24 the case, considering the importance of the issues at stake in the action, the amount in controversy,
25 the parties' relative access to relevant information, the parties' resources, the importance of the
26 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
27 outweighs its likely benefit.

1 Waymo will produce documents sufficient to show the way in which Waymo employees
2 seeking to access Waymo's SVN server are instructed to download TortoiseSVN, as located
3 through a reasonably diligent search of both custodial documents and non-custodial repositories.
4

5 **REQUEST FOR PRODUCTION NO. 7:**

6 Documents sufficient to show any Waymo policy, procedure, or guideline, including but
7 not limited to any training, regarding the installation and use of TortoiseSVN or other software
8 that may be used to access Waymo's SVN server.
9

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

11 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
12 the case, considering the importance of the issues at stake in the action, the amount in controversy,
13 the parties' relative access to relevant information, the parties' resources, the importance of the
14 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
15 outweighs its likely benefit.

16 Waymo will produce documents sufficient to show the way in which Waymo employees
17 seeking to access Waymo's SVN server are instructed to download TortoiseSVN.
18

19 **REQUEST FOR PRODUCTION NO. 8:**

20 All documents supporting Waymo's claim that "Mr. Levandowski then download over
21 14,000 proprietary files from that [design] server" as described in paragraph 44 of the Waymo
22 Complaint.
23

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

25 Waymo objects to this request to the extent that it seeks information protected by the
26 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
27 from discovery.
28

1 Waymo has produced documents supporting Waymo's claim that "the Levandowski work
2 laptop then downloaded over 14,000 files from the SVN repository, also on December 11, 2015."
3 Dkt. 25-29 ¶ 17. *See* WAYMO-UBER-00000648-943.

4
5 **REQUEST FOR PRODUCTION NO. 9:**

6 Documents sufficient to show how often Mr. Levandowski, and other Waymo employees,
7 including members of Project Chauffeur, accessed Waymo's SVN server from January 2014 to the
8 present.

9
10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

11 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
12 the case, considering the importance of the issues at stake in the action, the amount in controversy,
13 the parties' relative access to relevant information, the parties' resources, the importance of the
14 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
15 outweighs its likely benefit.

16 Waymo has produced the log of Anthony Levandowski's activity on Waymo's SVN server
17 on December 11, 2015. *See* WAYMO-UBER-00000944. Waymo will not produce additional
18 documents responsive to this request.

19
20 **REQUEST FOR PRODUCTION NO. 10:**

21 Documents sufficient to show how often Mr. Levandowski, and other Waymo employees,
22 including members of Project Chauffeur, accessed or viewed file(s) or information stored on
23 Waymo's SVN server relating to Waymo's LiDAR technology from January 2014 to the present.

24
25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

26 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
27 the case, considering the importance of the issues at stake in the action, the amount in controversy,
28 the parties' relative access to relevant information, the parties' resources, the importance of the

1 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
2 outweighs its likely benefit.

3 Waymo has produced the log of Anthony Levandowski's activity on Waymo's SVN server
4 on December 11, 2015. See WAYMO-UBER-00000944. Waymo will not produce additional
5 documents responsive to this request.

6
7 **REQUEST FOR PRODUCTION NO. 11:**

8 Documents sufficient to show how often Mr. Levandowski, and other Waymo employees,
9 including members of Project Chauffeur, downloaded file(s) or information from Waymo's SVN
10 server from January 2014 to the present.

11
12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

13 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
14 the case, considering the importance of the issues at stake in the action, the amount in controversy,
15 the parties' relative access to relevant information, the parties' resources, the importance of the
16 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
17 outweighs its likely benefit.

18 Waymo has produced the log of Anthony Levandowski's activity on Waymo's SVN server
19 on December 11, 2015. See WAYMO-UBER-00000944. Waymo will not produce additional
20 documents responsive to this request.

21
22 **REQUEST FOR PRODUCTION NO. 12:**

23 Documents sufficient to show how often Mr. Levandowski, and other Waymo employees,
24 including members of Project Chauffeur, downloaded file(s) or information stored on Waymo's
25 SVN server relating to Waymo's LiDAR technology from January 2014 to the present.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

2 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
3 the case, considering the importance of the issues at stake in the action, the amount in controversy,
4 the parties' relative access to relevant information, the parties' resources, the importance of the
5 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
6 outweighs its likely benefit.

7 Waymo has produced the log of Anthony Levandowski's activity on Waymo's SVN server
8 on December 11, 2015. See WAYMO-UBER-00000944. Waymo will not produce additional
9 documents responsive to this request.

10
11 **REQUEST FOR PRODUCTION NO. 13:**

12 Documents sufficient to show how often Mr. Levandowski, and other Waymo employees,
13 including members of Project Chauffeur, downloaded device file(s) or information from Waymo's
14 SVN server to a personal computer or media device from January 2014 to the present.

15
16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

17 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
18 the case, considering the importance of the issues at stake in the action, the amount in controversy,
19 the parties' relative access to relevant information, the parties' resources, the importance of the
20 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
21 outweighs its likely benefit.

22 Waymo has produced the log of Anthony Levandowski's activity on Waymo's SVN server
23 on December 11, 2015. See WAYMO-UBER-00000944. Waymo will not produce additional
24 documents responsive to this request.

25
26 **REQUEST FOR PRODUCTION NO. 14:**

27 Documents sufficient to show how often Mr. Levandowski, and other Waymo employees,
28 including members of Project Chauffeur, downloaded file(s) or information relating to Waymo's

1 LiDAR technology from Waymo's SVN server to a personal computer or media device from
2 January 2014 to the present.

3
4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

5 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
6 the case, considering the importance of the issues at stake in the action, the amount in controversy,
7 the parties' relative access to relevant information, the parties' resources, the importance of the
8 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
9 outweighs its likely benefit.

10 Waymo has produced the log of Anthony Levandowski's activity on Waymo's SVN server
11 on December 11, 2015. See WAYMO-UBER-00000944. Waymo will not produce additional
12 documents responsive to this request.

13
14 **REQUEST FOR PRODUCTION NO. 15:**

15 Documents sufficient to show how often Mr. Levandowski, and other Waymo employees,
16 including members of Project Chauffeur, downloaded file(s) or information stored on Google
17 Drive relating to Waymo's LiDAR technology from January 2014 to the present.

18
19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

20 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
21 the case, considering the importance of the issues at stake in the action, the amount in controversy,
22 the parties' relative access to relevant information, the parties' resources, the importance of the
23 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
24 outweighs its likely benefit.

25 Waymo has produced documents sufficient to show the Drive downloads by Mr.
26 Levandowski that are at issue in this case. See WAYMO-UBER-00000648. Waymo has also
27 produced documents sufficient to show how often other members of Project Chauffeur
28 downloaded files from Google Drive. See, e.g., WAYMO-UBER-00001963.

1 **REQUEST FOR PRODUCTION NO. 16:**

2 Documents sufficient to show how often Mr. Levandowski, and other Waymo employees,
3 including members of Project Chauffeur, downloaded device file(s) or information from Google
4 Drive to a personal computer or media device from January 2014 to the present.

5
6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

7 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
8 the case, considering the importance of the issues at stake in the action, the amount in controversy,
9 the parties' relative access to relevant information, the parties' resources, the importance of the
10 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
11 outweighs its likely benefit.

12 Waymo has produced documents sufficient to show the Drive downloads by Mr.
13 Levandowski that are at issue in this case. *See* WAYMO-UBER-00000648. Waymo has also
14 produced documents sufficient to show how often other members of Project Chauffeur
15 downloaded files from Google Drive. *See, e.g.*, WAYMO-UBER-00001963.

16
17 **REQUEST FOR PRODUCTION NO. 17:**

18 Detailed records, logs, metadata, and other information sufficient to show each access to
19 Waymo's SVN server from January 2014 to the present, including, for each access, at least the
20 following: the employee requesting access, time of access, the location and device from which
21 Waymo's SVN server was accessed, the file(s) or information accessed, the number files accessed,
22 and the volume of files accessed.

23
24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

25 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
26 the case, considering the importance of the issues at stake in the action, the amount in controversy,
27 the parties' relative access to relevant information, the parties' resources, the importance of the
28

1 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
2 outweighs its likely benefit.

3 Waymo has produced the log of Anthony Levandowski's activity on Waymo's SVN server
4 on December 11, 2015. See WAYMO-UBER-00000944. Waymo will not produce additional
5 documents responsive to this request.

6
7 **REQUEST FOR PRODUCTION NO. 18:**

8 Detailed records, logs, metadata, and other information sufficient to show each download
9 from Waymo's SVN server from January 2014 to the present, including, for each download, at
10 least the following: the employee requesting the download, the time of download, the location and
11 device to which the file(s) or information was downloaded, the file(s) downloaded, the number
12 files downloaded, and the volume of files downloaded.

13
14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

15 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
16 the case, considering the importance of the issues at stake in the action, the amount in controversy,
17 the parties' relative access to relevant information, the parties' resources, the importance of the
18 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
19 outweighs its likely benefit.

20 Waymo has produced the log of Anthony Levandowski's activity on Waymo's SVN server
21 on December 11, 2015. See WAYMO-UBER-00000944. Waymo will not produce additional
22 documents responsive to this request.

23
24 **REQUEST FOR PRODUCTION NO. 19:**

25 Detailed records, logs, metadata, and other information sufficient to show each download
26 from Google Drive relating to Waymo's LiDAR technology from January 2014 to the present,
27 including, for each download, at least the following: the employee requesting the download, the
28

1 time of download, the location and device to which the file(s) or information was downloaded, the
2 file(s) downloaded, the number files downloaded, and the volume of files downloaded.

3
4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

5 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
6 the case, considering the importance of the issues at stake in the action, the amount in controversy,
7 the parties' relative access to relevant information, the parties' resources, the importance of the
8 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
9 outweighs its likely benefit.

10 Waymo has produced documents sufficient to show the Drive downloads by Mr.
11 Levandowski that are at issue in this case. *See* WAYMO-UBER-00000648-943. Waymo has also
12 produced documents sufficient to show downloads by other members of Project Chauffeur from
13 Google Drive, including the individual requesting the download, the date and time of download,
14 the download destination, and the file(s) downloaded. *See, e.g.,* WAYMO-UBER-00001963.
15 Waymo will not produce additional documents in response to this request.

16
17 **REQUEST FOR PRODUCTION NO. 20:**

18 Detailed records, logs, metadata, and other information sufficient to show each instance in
19 which an employee transferred information from a Waymo computer or server to a personal
20 computer or removable media device.

21
22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

23 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
24 the case, considering the importance of the issues at stake in the action, the amount in controversy,
25 the parties' relative access to relevant information, the parties' resources, the importance of the
26 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
27 outweighs its likely benefit.

1 Waymo has produced documents supporting Waymo's claim that "a Transcend RDF5
2 USB 3.0 card reader was attached to the Levandowski work laptop for a period of approximately
3 eight hours on December 14, 2015." Dkt. 25-29 ¶ 18. See WAYMO-UBER-00000648-943.
4 Waymo will not produce additional documents in response to this request.
5

6 **REQUEST FOR PRODUCTION NO. 21:**

7 Detailed records, logs, metadata, and other information sufficient to show each instance
8 from January 2014 to the present in which a foreign device was detected to be attached to, or
9 removed from, an employee's device, including, but not limited to, any log generated by Google's
10 endpoint security solutions, Bit9.
11

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

13 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
14 the case, considering the importance of the issues at stake in the action, the amount in controversy,
15 the parties' relative access to relevant information, the parties' resources, the importance of the
16 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
17 outweighs its likely benefit.

18 Waymo has produced documents supporting Waymo's claim that "a Transcend RDF5
19 USB 3.0 card reader was attached to the Levandowski work laptop for a period of approximately
20 eight hours on December 14, 2015." Dkt. 25-29 ¶ 18. See WAYMO-UBER-00000648-943.
21 Waymo will not produce additional documents responsive to this request.
22

23 **REQUEST FOR PRODUCTION NO. 22:**

24 All software applications required to view and analyze the records, logs, metadata or other
25 information produced in response to RFP Nos. 17-21.
26
27
28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

2 Waymo responds that standard software such as Microsoft Excel is capable of viewing and
3 analyzing the documents produced in relation to RFP Nos. 17-21.

4
5 **REQUEST FOR PRODUCTION NO. 23:**

6 Documents sufficient to show any Waymo policy, procedure, or guideline, including but
7 not limited to any training, regarding the download of file(s) or information from Waymo's SVN
8 server.

9
10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

11 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
12 the case, considering the importance of the issues at stake in the action, the amount in controversy,
13 the parties' relative access to relevant information, the parties' resources, the importance of the
14 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
15 outweighs its likely benefit.

16 Waymo will produce documents sufficient to show Waymo policies, procedures, and
17 guidelines relating to highly confidential information such as the information stored on Waymo's
18 SVN server, as well as documents sufficient to show the use and features of Waymo's SVN
19 server, as located through a reasonably diligent search of both custodial documents and non-
20 custodial repositories.

21
22 **REQUEST FOR PRODUCTION NO. 24:**

23 Documents sufficient to show any Waymo policy, procedure, or guideline, including but
24 not limited to any training, regarding any practice of downloading versus viewing file(s) or
25 information from Waymo's SVN server.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

2 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
3 the case, considering the importance of the issues at stake in the action, the amount in controversy,
4 the parties' relative access to relevant information, the parties' resources, the importance of the
5 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
6 outweighs its likely benefit.

7 Waymo will produce documents sufficient to show Waymo policies, procedures, and
8 guidelines relating to highly confidential information such as the information stored on Waymo's
9 SVN server, as well as documents sufficient to show the use and features of Waymo's SVN
10 server.

11
12 **REQUEST FOR PRODUCTION NO. 25:**

13 All documents supporting Waymo's claim that "On December 14, 2015, Mr. Levandowski
14 attached a removable media device (an SD Card) to the laptop containing the downloaded files for
15 approximately eight hours" as described in paragraph 45 of the Waymo Complaint.

16
17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

18 Waymo objects to this request to the extent that it seeks information protected by the
19 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
20 from discovery, considering the importance of the issues at stake in the action, the amount in
21 controversy, the parties' relative access to relevant information, the parties' resources, the
22 importance of the discovery in resolving the issues, and whether the burden or expense of the
23 proposed discovery outweighs its likely benefit.

24 Waymo has produced documents supporting Waymo's claim that "a Transcend RDF5
25 USB 3.0 card reader was attached to the Levandowski work laptop for a period of approximately
26 eight hours on December 14, 2015." Dkt. 25-29 ¶ 18. See WAYMO-UBER-00000648-943.

1 **REQUEST FOR PRODUCTION NO. 26:**

2 Documents sufficient to show how often Waymo employees, including members of Project
3 Chauffeur, download file(s) or information to a personal computer or a removable media device,
4 such as flash drives.
5

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

7 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
8 the case, considering the importance of the issues at stake in the action, the amount in controversy,
9 the parties' relative access to relevant information, the parties' resources, the importance of the
10 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
11 outweighs its likely benefit.

12 Waymo has produced documents supporting Waymo's claim that "a Transcend RDF5
13 USB 3.0 card reader was attached to the Levandowski work laptop for a period of approximately
14 eight hours on December 14, 2015." Dkt. 25-29 ¶ 18. *See* WAYMO-UBER-00000648-943.
15 Waymo has also produced documents sufficient to show downloads by other members of Project
16 Chauffeur from Google Drive, including the individual requesting the download, the date and time
17 of download, the download destination, and the file(s) downloaded. *See, e.g.,* WAYMO-UBER-
18 00001963. Waymo will not produce additional documents in response to this request.
19

20 **REQUEST FOR PRODUCTION NO. 27:**

21 Documents sufficient to show how files transferred from Waymo computer or server to a
22 personal computer or removable media device are secured against unauthorized access.
23

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

25 Waymo will produce documents sufficient to show Waymo policies, procedures, training,
26 and guidelines relating to highly confidential information, including relating to the transfer of such
27 information to removable media devices, to the extent Waymo locates any such policies,
28 procedures, training, or guidelines through a reasonably diligent search.

1 **REQUEST FOR PRODUCTION NO. 28:**

2 Documents sufficient to show any Waymo policy, procedure, or guideline, including but
3 not limited to any training, regarding the use of a personal computer or a removable media device,
4 including flash drives.

5
6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

7 Waymo will produce documents sufficient to show Waymo policies, procedures, training,
8 and guidelines relating to highly confidential information, including relating to the transfer of such
9 information to removable media devices.

10
11 **REQUEST FOR PRODUCTION NO. 29:**

12 All documents supporting Waymo's claim that "On December 18, 2015, seven days after
13 Mr. Levandowski completed his download of confidential Waymo information and four days after
14 he removed the SD Card, he reformatted the laptop" as described in paragraph 46 of the Waymo
15 Complaint.

16
17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

18 Waymo objects to this request to the extent that it seeks information protected by the
19 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
20 from discovery.

21 Waymo has produced documents supporting Waymo's claim that "the Levandowski work
22 laptop was reformatted from a Windows operating system to a Linux operating system (Goobuntu,
23 Google's custom version of Ubuntu Linux) on December 18, 2015." Dkt. 25-29 ¶ 19. *See*
24 WAYMO-UBER-00000648-943.

25
26 **REQUEST FOR PRODUCTION NO. 30:**

27 Documents sufficient to show how often Waymo computers are reformatted.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit.

Waymo has produced documents supporting Waymo's claim that "the Levandowski work laptop was reformatted from a Windows operating system to a Linux operating system (Goobuntu, Google's custom version of Ubuntu Linux) on December 18, 2015." Dkt. 25-29 ¶ 19. *See* WAYMO-UBER-00000648-943. Waymo will not produce additional documents in response to this request.

REQUEST FOR PRODUCTION NO. 31:

Documents sufficient to show how often Waymo computers are reformatted to install the Linux operating system.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit.

Waymo has produced documents supporting Waymo's claim that "the Levandowski work laptop was reformatted from a Windows operating system to a Linux operating system (Goobuntu, Google's custom version of Ubuntu Linux) on December 18, 2015." Dkt. 25-29 ¶ 19. *See* WAYMO-UBER-00000648-943. Waymo will not produce additional documents in response to this request.

1 **REQUEST FOR PRODUCTION NO. 32:**

2 Documents sufficient to show any Waymo policy, procedure, or guideline, including but
3 not limited to any training, regarding the formatting of Waymo computers.
4

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

6 Waymo will produce documents sufficient to show Waymo policies, procedures, training,
7 and guidelines relating to highly confidential information, including relating to the formatting of
8 Waymo computers, to the extent Waymo locates any such policies, procedures, training, or
9 guidelines through a reasonably diligent search.
10

11 **REQUEST FOR PRODUCTION NO. 33:**

12 All documents supporting Waymo's claim that "Mr. Levandowski used his Waymo
13 credentials and security clearances to download additional confidential Waymo documents to a
14 personal device" as described in paragraph 47 of the Waymo Complaint.
15

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

17 Waymo objects to this request to the extent that it seeks information protected by the
18 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
19 from discovery.

20 Waymo has produced documents supporting Waymo's claim that "the Google GAIA
21 ID... assigned to Anthony Levandowski exported five documents from Google Drive to a
22 personal device (i.e., one that was not issued by Google) on January 4, 2016, over an
23 approximately three minute period" and "on January 11, 2016 ... exported another document
24 from Google Drive to a personal device." Dkt. 25-29 ¶ 22-23. *See* WAYMO-UBER-00000648-
25 943.
26
27
28

1 **REQUEST FOR PRODUCTION NO. 34:**

2 Documents sufficient to show how often Waymo employees, including members of Project
3 Chauffeur, download “TL weekly updates” documents.
4

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

6 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
7 the case, considering the importance of the issues at stake in the action, the amount in controversy,
8 the parties’ relative access to relevant information, the parties’ resources, the importance of the
9 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
10 outweighs its likely benefit.

11 Waymo has produced documents supporting Waymo’s claim that Mr. Levandowski
12 downloaded a “TL weekly updates” document. Dkt. 25-29 ¶ 23; *see* WAYMO-UBER-00000648-
13 943. Waymo has also produced documents sufficient to show downloads by other members of
14 Project Chauffeur from Google Drive, including the individual requesting the download, the date
15 and time of download, the download destination, and the file(s) downloaded. *See, e.g.*, WAYMO-
16 UBER-00001963. Waymo will not produce additional documents in response to this request.
17

18 **REQUEST FOR PRODUCTION NO. 35:**

19 Documents sufficient to show the number of times that Waymo employees, including
20 members of Project Chauffeur, downloaded more than 10,000 files in one instance or at one time.
21

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

23 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
24 the case, considering the importance of the issues at stake in the action, the amount in controversy,
25 the parties’ relative access to relevant information, the parties’ resources, the importance of the
26 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
27 outweighs its likely benefit.
28

1 Waymo has produced documents supporting Waymo's claim that "the Levandowski work
2 laptop then downloaded over 14,000 files from the SVN repository, also on December 11, 2015."
3 Dkt. 25-29 ¶ 17. See WAYMO-UBER-00000648-943. Waymo will not produce additional
4 documents in response to this request.

5
6 **REQUEST FOR PRODUCTION NO. 36:**

7 Documents sufficient to show the number of times that Waymo employees, including
8 members of Project Chauffeur, downloaded more than 1 GB of information in one instance or at
9 one time.

10
11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 36:**

12 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
13 the case, considering the importance of the issues at stake in the action, the amount in controversy,
14 the parties' relative access to relevant information, the parties' resources, the importance of the
15 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
16 outweighs its likely benefit.

17 Waymo has produced documents supporting Waymo's claim that "the Levandowski work
18 laptop then downloaded over 14,000 files from the SVN repository, also on December 11, 2015."
19 Dkt. 25-29 ¶ 17. See WAYMO-UBER-00000648-943. Waymo will not produce additional
20 documents in response to this request.

21
22 **REQUEST FOR PRODUCTION NO. 37:**

23 Documents sufficient to identify the content of Waymo's SVN server.

24
25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

26 Waymo objects to this request as irrelevant to the extent that it asks for documents relating
27 to the content of Waymo's SVN server on any date other than December 11, 2015.

1 On March 22, 2017, pursuant to Section 9 of the Patent Local Rule 2-2 Interim Model
2 Protective Order (“Interim Protective Order”), Waymo made available for inspection the
3 approximately 14,000 documents downloaded by Mr. Levandowski and misappropriated by
4 Defendants. These files remain available for inspection. These documents are designated
5 HIGHLY CONFIDENTIAL – SOURCE CODE under the Interim Protective Order.

6
7 **REQUEST FOR PRODUCTION NO. 38:**

8 Documents sufficient to show the total number and size of files stored on Waymo’s SVN
9 server.

10
11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 38:**

12 Waymo objects to this request as irrelevant to the extent that it asks for documents relating
13 to the content of Waymo’s SVN server on any date other than December 11, 2015.

14 On March 22, 2017, pursuant to Section 9 of the Interim Protective Order, Waymo made
15 available for inspection the approximately 14,000 documents downloaded by Mr. Levandowski
16 and misappropriated by Defendants. These files remain available for inspection. These
17 documents are designated HIGHLY CONFIDENTIAL – SOURCE CODE under the Interim
18 Protective Order.

19
20 **REQUEST FOR PRODUCTION NO. 39:**

21 Documents sufficient to show the total number and size of files stored on Waymo’s SVN
22 server relating to Waymo’s LiDAR technology.

23
24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 39:**

25 Waymo objects to this request as irrelevant to the extent that it asks for documents relating
26 to the content of Waymo’s SVN server on any date other than December 11, 2015.

27 On March 22, 2017, pursuant to Section 9 of the Interim Protective Order, Waymo made
28 available for inspection the approximately 14,000 documents downloaded by Mr. Levandowski

1 and misappropriated by Defendants. These files remain available for inspection. These
2 documents are designated HIGHLY CONFIDENTIAL – SOURCE CODE under the Interim
3 Protective Order.

4
5 **REQUEST FOR PRODUCTION NO. 40:**

6 Documents sufficient to identify all data management systems where Waymo confidential
7 or and/or proprietary technical documents or information are stored.

8
9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 40:**

10 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
11 the case, considering the importance of the issues at stake in the action, the amount in controversy,
12 the parties' relative access to relevant information, the parties' resources, the importance of the
13 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
14 outweighs its likely benefit, to the extent that it concerns data management systems not at issue in
15 this litigation (i.e., Waymo's SVN Server and Google Drive).

16 Waymo has produced a document identifying all Waymo employees, including members
17 of Project Chauffeur, who have access to Waymo's SVN server or who had access to Waymo's
18 SVN server from June 2015 to the present. *See* WAYMO-UBER-00007211.

19
20 **REQUEST FOR PRODUCTION NO. 41:**

21 Documents sufficient to identify users with access to each of the data management systems
22 responsive to RFP No. 40.

23
24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 41:**

25 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
26 the case, considering the importance of the issues at stake in the action, the amount in controversy,
27 the parties' relative access to relevant information, the parties' resources, the importance of the
28 discovery in resolving the issues, and whether the burden or expense of the proposed discovery

1 outweighs its likely benefit, to the extent that it concerns data management systems not at issue in
2 this litigation (i.e., Waymo's SVN Server and Google Drive).

3 Waymo has produced a document identifying all Waymo employees, including members
4 of Project Chauffeur, who have access to Waymo's SVN server or who had access to Waymo's
5 SVN server from June 2015 to the present. *See* WAYMO-UBER-00007211.

6
7 **REQUEST FOR PRODUCTION NO. 42:**

8 Documents sufficient to show the total number and size of files stored on Waymo's SVN
9 server relating to specifications of Waymo's LiDAR technology.

10
11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 42:**

12 Waymo objects to this request as irrelevant to the extent that it asks for documents relating
13 to the content of Waymo's SVN server on any date other than December 11, 2015.

14 On March 22, 2017, pursuant to Section 9 of the Interim Protective Order, Waymo made
15 available for inspection the approximately 14,000 documents downloaded by Mr. Levandowski
16 and misappropriated by Defendants. These files remain available for inspection. These
17 documents are designated HIGHLY CONFIDENTIAL – SOURCE CODE under the Interim
18 Protective Order.

19
20 **REQUEST FOR PRODUCTION NO. 43:**

21 Documents sufficient to show the total number and size of files stored on Waymo's SVN
22 server relating to the manufacture, assembly, calibration, and testing of Waymo's LiDAR
23 technology.

24
25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 43:**

26 Waymo objects to this request as irrelevant to the extent that it asks for documents relating
27 to the content of Waymo's SVN server on any date other than December 11, 2015.

1 On March 22, 2017, pursuant to Section 9 of the Interim Protective Order, Waymo made
2 available for inspection the approximately 14,000 documents downloaded by Mr. Levandowski
3 and misappropriated by Defendants. These files remain available for inspection. These
4 documents are designated HIGHLY CONFIDENTIAL – SOURCE CODE under the Interim
5 Protective Order.

6
7 **REQUEST FOR PRODUCTION NO. 44:**

8 Documents sufficient to show to any collection, analysis, review, or findings related to
9 Waymo computers, email, or other devices of Mr. Levandowski, current Waymo employees
10 and/or Waymo devices of former employees upon their departure from Waymo LLC or Project
11 Chauffeur since January 2009.

12
13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 44:**

14 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
15 the case, considering the importance of the issues at stake in the action, the amount in controversy,
16 the parties' relative access to relevant information, the parties' resources, the importance of the
17 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
18 outweighs its likely benefit. Waymo objects to this request to the extent that it seeks information
19 protected by the attorney-client privilege or the work product doctrine or that is otherwise
20 privileged or protected from discovery.

21 Waymo has produced documents underlying the forensic investigation described in the
22 declaration of Gary Brown. *See* Dkt. 25-29; WAYMO-UBER-00000648-943. Waymo will not
23 produce additional documents in response to this request.

24
25 **REQUEST FOR PRODUCTION NO. 45:**

26 All electronic images or backup image files of computers, including laptop computers, and
27 other devices used by Mr. Levandowski prior to his departure from Waymo.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 45:**

2 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
3 the case to the extent that it seeks information unrelated to Waymo's allegations in this case.
4 Waymo objects to this request to the extent that it seeks information protected by the attorney-
5 client privilege or the work product doctrine or that is otherwise privileged or protected from
6 discovery. Waymo objects to this request to the extent that it seeks information that is not in
7 Waymo's possession, custody, or control.

8 Waymo has produced documents underlying the forensic investigation described in the
9 declaration of Gary Brown. *See* Dkt. 25-29; WAYMO-UBER-00000648-943. Waymo will not
10 produce additional documents in response to this request.

11
12 **REQUEST FOR PRODUCTION NO. 46:**

13 All documents relating to any forensic investigation and analysis of computers, including
14 laptop computers, and other devices, or images thereof, used by Mr. Levandowski prior to his
15 departure from Waymo.

16
17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 46:**

18 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
19 the case, considering the importance of the issues at stake in the action, the amount in controversy,
20 the parties' relative access to relevant information, the parties' resources, the importance of the
21 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
22 outweighs its likely benefit. Waymo objects to this request to the extent that it seeks information
23 protected by the attorney-client privilege or the work product doctrine or that is otherwise
24 privileged or protected from discovery.

25 Waymo has produced documents underlying the forensic investigation described in the
26 declaration of Gary Brown. *See* Dkt. 25-29; WAYMO-UBER-00000648-943. Waymo will not
27 produce additional documents in response to this request.

1 **REQUEST FOR PRODUCTION NO. 47:**

2 Documents sufficient to show any Waymo policy, procedure, or guideline, including but
3 not limited to any training, regarding the use of computers, email, or other devices for work on
4 behalf of Waymo.

5
6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 47:**

7 Waymo will produce documents sufficient to show Waymo policies, procedures, training,
8 and guidelines relating to highly confidential information, including relating to the use of
9 computers, email, or other devices for work on behalf of Waymo, to the extent Waymo locates any
10 such policies, procedures, training, or guidelines through a reasonably diligent search.

11
12 **REQUEST FOR PRODUCTION NO. 48:**

13 Documents sufficient to show any Waymo policy, procedure, or guideline, including but
14 not limited to any training, regarding access to Waymo documents, data, or information by
15 Waymo employees.

16
17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 48:**

18 Waymo objects to this request as vague and overbroad to the extent it refers to “Waymo
19 documents, data, or information.”

20 Waymo will produce documents sufficient to show Waymo policies, procedures, training,
21 and guidelines relating to highly confidential information, including relating to access to Waymo
22 documents, data, or information by Waymo employees, to the extent Waymo locates any such
23 policies, procedures, training, or guidelines through a reasonably diligent search.

24
25 **REQUEST FOR PRODUCTION NO. 49:**

26 Documents sufficient to show any Waymo policy, procedure, or guideline against deleting
27 documents, data, or information from Waymo computers, email, or other devices.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 49:**

2 Waymo will produce documents sufficient to show Waymo policies, procedures, training,
3 and guidelines relating to highly confidential information, including relating to deleting
4 documents, data or information, to the extent Waymo locates any such policies, procedures,
5 training, or guidelines through a reasonably diligent search.

6
7 **REQUEST FOR PRODUCTION NO. 50:**

8 Any versions of an employee handbook applicable to Waymo employees, including
9 members of Project Chauffeur, from 2009 to the present.

10
11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 50:**

12 Waymo objects to this request as irrelevant, overbroad, and not proportional to the needs
13 of the case to the extent it concerns portions of an employee handbook unrelated to any issue in
14 the Action.

15 Waymo has produced responsive portions of all versions of the employee handbook
16 applicable to Waymo employees dating back to 2009, as located through a reasonably diligent
17 search. *See* WAYMO-UBER-00006559-6878.

18
19 **REQUEST FOR PRODUCTION NO. 51:**

20 Documents sufficient to identify all members of Project Chauffeur from January 1, 2014
21 until December 31, 2015.

22
23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 51:**

24 Waymo objects to this request as irrelevant, overbroad, and not proportional to the needs
25 of the case, considering the importance of the issues at stake in the action, the amount in
26 controversy, the parties' relative access to relevant information, the parties' resources, the
27 importance of the discovery in resolving the issues, and whether the burden or expense of the
28 proposed discovery outweighs its likely benefit.

1 Waymo will produce a list of Project Chauffeur personnel, including start dates and end
2 dates.

3
4 DATED: June 16, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

5
6 By /s/ Charles K. Verhoeven

Charles K. Verhoeven

7 Attorneys for WAYMO LLC
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APPENDIX

Information On Document Collection and Production Under Supplement Order ¶ 13

Waymo further provides information on its collection efforts under Paragraph 13 of the Supplemental Order. As of June 16, 2017, Waymo has searched the following sources of information in response to Defendants' requests for production:

- Waymo custodial document repositories (e.g., email repositories, Google Docs, locally stored electronic documents)
- Waymo non-custodial document repositories (e.g., Drive folders used by various teams at Waymo, personnel files, Google personnel files including policy documents, codes of conduct, employee handbooks, and employment and confidentiality agreements)

As of June 16, 2017, the following individuals employed by Waymo or Google have searched for documents in response to Defendants' requests for production:

- Raquel Small-Weikert (Paralegal) – general search responsibility
- Christine Lok (Paralegal) – general search responsibility
- Toni Baker (Paralegal) – general search responsibility
- Margo Maddux (Patent Agent) – search responsibility relating to patent-related documentation
- Michael Lin (People Coordinator) – search responsibility relating to employment documentation and electronic device recovery
- Joanne Chin (Head of People Operations) – search responsibility relating to employment documentation and electronic device recovery
- Jack Brown (Waymo, CAD Data and PLM Program Manager) – search responsibility relating to Waymo secure server access and activity
- Pierre Yves-Droz (Waymo, Principal Hardware Engineer) – search responsibility relating to documents relating to LiDAR development
- Caroline Manchot (Director of Compensation) – search responsibility relating to documents relating to the bonus plan
- Ron Medford (Waymo, Director of Safety) – search responsibility relating to documents submitted to or discussed with a public entity